

HENRY R. KAUFMAN, P.C.

ATTORNEYS AT LAW
60 EAST 42ND STREET
47TH FLOOR
NEW YORK, NEW YORK 10165

(212) 880-0842
FACSIMILE (212) 682-1965

WWW.HRKAUFMAN.COM
HKAUFMAN@HRKAUFMAN.COM

April 22, 2019

Hon. Robert M. Levy
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Monica Morrison v. Robert Langrick: 1:18-cv-06127 (CBA) (RML)

Dear Judge Levy,

This letter is in reply to Defendant Robert Langrick's opposition to our motion for an extension and in-person conference.

In our motion for an extension and conference we predicted that, unfortunately, unresolved discovery disputes would continue to fester and proliferate in the absence of this Court's intervention.

In this we were correct. Defendant's counsel have opposed our motion *and* have at the same time filed their second motion to compel no more than a couple of days after Defendant's alleged default and – for the second time – without any serious effort to reach a good faith resolution of the still open disputes.

I respectfully submit that the current impass between counsel strongly supports the wisdom of a brief extension until this Court can schedule an in-person conference to resolve the critically-important, open discovery disputes. And so that Your Honor can at the same time get this case back on a proper track – without affording Ms. Morrison's attacker the opportunity for unjustifiable, intrusive and unchecked rummaging through Ms. Morrison's most intimate life experiences for over a decade *prior to* her actual claim for damages.

Finally, Your honor is also respectfully referred to our related letter of this date opposing Defendant's second motion to compel. Thank you for your consideration.

Respectfully submitted,



Henry R. Kaufman
Attorney for Plaintiff

Cc: All counsel (VIA EFILE)